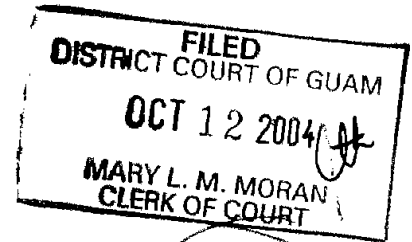


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)
)
Plaintiffs,)
)
v.)
)
HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)
Defendants.)
_____)

CIVIL CASE NO. 03-00036

**HSBC'S OBJECTIONS TO
MAGISTRATE JUDGE'S ORAL
ORDER DENYING MOTION FOR
PROTECTIVE ORDER
[FRCP 72(a)]; REQUEST FOR ORAL
ARGUMENT**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagåtña, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order

ORIGINAL

reversing the oral Order of the Magistrate Judge announced from the bench on October 8, 2004, which denied HSBC's Motion for a Protective Order filed the same day which requested this Court to strike the deposition notices issued by Plaintiffs to conduct the depositions in Guam of Magnus Montan and Christopher Page, as more fully explained in the Memorandum of Points and Authorities supporting these Objections contemporaneously filed herein.

The Objections will be based upon these Objections, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Objections. HSBC reserves the right to file supplemental Objections when the Magistrate Judge issues a written Order embodying the oral Order announced from the bench on October 8, 2004. HSBC requests oral argument on the Objections.

Dated this 13th day of October, 2004.

LAW OFFICES OF BRONZE & TANG

Attorneys for Defendant The Hongkong and Shanghai
Banking Corporation Ltd.

By: _____

JACQUES G. BRONZE

RAP/nsh